

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

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UNITED STATES OF AMERICA,

CR18-40027

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

STEPHANIE BROECKER,

Defendant.

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The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

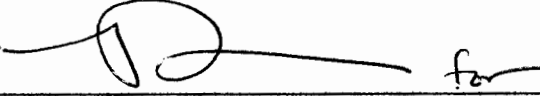
My name is Stephanie Broecker.

On or about November 16, 2017, I mailed heroin from Rockford, Illinois, to Kyle Pugh in Fedora, South Dakota, utilizing the United States Postal Service. Pugh received the U.S. Postal parcel that contained the heroin on November 18, 2017, in South Dakota. Pugh ingested the heroin that I sent him in the evening of November 18, 2017, and early morning hours of November 19, 2017. On November 19, 2017, Pugh died. Minnehaha County Coroner Dr. Kenneth Snell determined that Pugh's cause of death was heroin toxicity, and that but for the use of the heroin I sent Pugh, he would not have died on November 19, 2017.


The parties submit that the foregoing statement of facts is not intended to be a complete description of the offense or the Defendant's involvement in it. Instead, the statement is offered for the limited purpose of satisfying the

requirements of Fed. R. Crim. P. 11(b)(3). The parties understand that additional information relevant to sentencing, including additional drug quantities, may be developed and attributed to the Defendant for sentencing purposes.

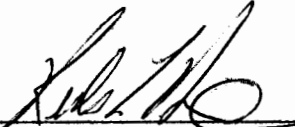
12/6/18  
Date

  
Jennifer D. Mammenga  
Assistant United States Attorney

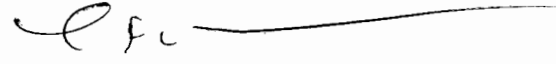
12/5/18  
Date

  
Stephanie Broecker  
Defendant

12/5/18  
Date

  
Rick L. Ramstad  
Attorney for Defendant

12/5/18  
Date

  
Lawrence S. Beaumont  
Attorney for Defendant